

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Jeffrey A. Schurr
Debtor

SN Servicing Corporation as Servicer
for U.S. Bank Trust National
Association, as Trustee of the
Bungalow Series IV Trust
Movant

v.

Jeffrey A. Schurr
Scott F. Waterman - Trustee
Respondents

Case No.: 17-13274-amc

Chapter: 13

Judge: Ashely M. Chan

Hearing: January 4, 2023 at 11:00 am

OBJECTION TO DEBTOR'S MOTION TO VACATE ORDER GRANTING RELIEF

SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of the Bungalow Series IV Trust responds to the Debtor's Motion to Vacate Order Granting Relief as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Creditor is without sufficient information upon which to form a belief as to the truth of this averment, and it is therefore denied.
5. A copy of the post-petition history is attached hereto as **"Exhibit A"**. Debtor is due for the July 1, 2022- December 1, 2022 payments at \$1,084.98, accrued late charges of \$154.12, less suspense in the amount of \$231.18. The total to post-petition reinstate is \$6,432.82.

6. Denied. Creditor is without sufficient information upon which to form a belief as to the truth of this averment, and it is therefore denied.

For the reasons stated above, and for any others that the Court deems fit to adopt,
Secured Creditor respectfully requests that Debtor's Motion for Reconsideration be denied.

Dated: December 14, 2022

By: /s/ Lauren M. Moyer
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